Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing a Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	

To: The Commission

COMMENTS OF MOBILE FUTURE

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SUMMARY

The Obama Administration and Federal Communications Commission have recognized the importance of ensuring that all Americans have access to the economic, safety, and community benefits of mobile broadband. Wireless service providers, driven by a highly competitive marketplace, are working to rapidly deploy next generation networks throughout the United States. Notwithstanding the tremendous efforts already underway, on-going support from the proposed Connect America Fund will be needed to reach consumers in the most remote areas of the country.

Mobile broadband is critical to the 21st century economy, and Americans across the nation should have the opportunity to realize the full benefits from wireless connections. The Commission should therefore conclude this proceeding expeditiously and provide on-going support for ubiquitous mobile broadband coverage in high-cost unserved areas.

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To: The Commission

COMMENTS OF MOBILE FUTURE

Mobile Future[1] provides these comments to highlight the importance of mobile broadband for the nation and to urge the Commission to provide on-going support for ubiquitous mobile broadband coverage from the proposed Connect America Fund ("CAF").[2] The President has called for making 4G high-speed wireless service available to 98 percent of Americans

[1] Mobile Future is a broad-based coalition of businesses, non-profit organizations and individuals interested in and dedicated to advocating for an environment in which innovations in wireless technology and services are enabled and encouraged. Our mission is to educate the public and key decision makers on innovations in the wireless industry that have transformed the way Americans work and play and to advocate continued investment in wireless technologies.

[2] Connect America Fund, WC Docket No. 10-190, *et al.*, *Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking*, FCC 11-13 (rel. Feb. 9, 2011) ("*Notice*").

within the next five years.[3] To achieve this goal, the Commission must make funding available on an on-going basis for both capital and operating expenses in high-cost areas. Absent adequate universal service support, millions of Americans living in rural areas will not have access to the benefits of mobile broadband.

I. AMERICA NEEDS MOBILE BROADBAND.

As President Obama has recognized, "[e]xtending access to high-speed wireless not only provides a valuable service to Americans living in [rural] areas – access to medical tests, online courses, and applications that have not yet been invented – but also catalyzes economic growth by enabling consumers and businesses living in those areas to participate in the 21st century economy."[4] Wireless service providers are investing tens of billions of dollars each year, to extend the coverage of next generation wireless networks across the United States and bring the promise of mobile broadband to nearly 300 million Americans, and enormous progress is being made. At the same time, on-going support from the CAF will be needed to help even more Americans fully realize the benefits of mobile broadband.

Consumers have spoken with their ever-increasing adoption of mobile broadband devices and applications; mobile broadband access is an invaluable part of our everyday lives – a conclusion echoed in the National Broadband Plan.[5] About 85% of American adults own a cell phone, and 69.5 million own smartphones.[6] More Americans will use smartphones than feature

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[3] Press Release, The White House, *President Obama Details Plan to Win the Future through Expanded Wireless Access* (Feb. 10, 2011) ("NWI Details"), http://www.whitehouse.gov/the-press-office/2011/02/10/president-obama-details-plan-win-future-through-expanded-wireless-access.

[4] *Id*.

[5] *See* FCC, *Connecting America: The National Broadband Plan*, 146 (rel. Mar. 16, 2010), http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-296935A1.pdf.

[6] *See* Susannah Fox, MOBILE HEALTH 2010, PEW INTERNET & AMERICAN LIFE PROJECT 2 (Oct. 19, 2010) ("Mobile Health"), http://www.pewinternet.org/~/media//Files/Reports/2010/PIP_Mobile_Health_2010.pdf; Press Release, comScore, *comScore Reports February 2011 U.S. Mobile Subscriber Market Share* (Apr. 1, 2011) ("comScore Report"),

phones by the end of the year based on current estimates.[7] Consumers are increasingly using mobile tablets with 10.3 million sold in the U.S. in 2010.[8] While tablets were virtually non-existent just two years ago, more than 82 million adults in the U.S. are expected to use one by 2015.[9]

Consumers are increasingly buying electronic devices embedded with mobile broadband such as e-Readers, netbooks, and personal navigation devices, and more recently mobile hotspots. The compound annual growth rate for these devices is 65.2% with global shipments expected to reach 271 million by 2015.[10] Machine-to-machine ("M2M") devices that utilize wireless sensors and infrastructure to transmit data from utility meters, parking meters, traffic lights, medical equipment, and much more are also becoming more pervasive in our society.[11] One analyst predicts that there will be 10 billion wirelessly-connected devices worldwide by 2020.[12]

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http://www.comscore.com/Press_Events/Press_Releases/2011/4/comScore_Reports_February_2011_U.S._Mobile_Subscriber_Market_Share.

[7] Roger Entner, *Smartphones to Overtake Feature Phones in U.S. by 2011*, NIELSENWIRE, Mar. 26, 2010, http://blog.nielsen.com/nielsenwire/consumer/smartphones-to-overtake-feature-phones-in-u-s-by-2011/#.

[8] *See Tablets to Surpass Laptop Sales In 2015, One Third of US Consumers Will Own One*, MOBILEMARKETINGWATCH, Jan. 5, 2011, http://www.mobilemarketingwatch.com/tablets-to-surpass-laptop-sales-in-2015-one-third-of-us-consumers-will-own-one-12356/.

[9] *See* Andrew Munchbach, *Forrester Research: Over 82 Million Tablet Users in U.S. by 2015*, BGR, Jan. 4, 2011, http://www.bgr.com/2011/01/04/forrester-research-over-82-million-tablet-users-in-u-s-by-2015/#.

[10] News Release, Berg Insight, *Shipments of consumer electronics devices with embedded mobile broadband doubled in 2010* (Feb. 1, 2011), http://www.berginsight.com/News.aspx?m_m=6&s_m=1.

[11] And with the announcements of several new M2M devices coming online for the 4G LTE technology platform, Americans have much to look forward to in the years to come. *See* Jason Hiner, *Smartphones, Tablets, and M2M coming to Verizon 4G Network*, ZDNET, Oct. 7, 2010, http://www.zdnet.com/blog/btl/smartphones-tablets-and-m2m-coming-to-verizon-4g-network/40148; *see also* Press Release, Verizon Wireless, *OnStar Leverages The Verizon Wireless 4G LTE Network To Drive The Future Of In-Vehicle Services* (Jan. 5, 2011) (showcasing the future of in-vehicle communications), http://news.vzw.com/news/2011/01/pr2011-01-04.html; News Release, Berg Insight, *Berg Insight Releases Global Wireless M2M Subscriber Data for 2010* (Jan. 31, 2011) (reporting that the "worldwide number of mobile network connections used for wireless M2M (machine-to-machine) communication reached 81.4 million at the end of 2010, up 46 percent"), http://www.berginsight.com/News.aspx?m_m=6&s_m=1.

[12] Press Release, Morgan Stanley, *Mobile Internet Report* 17 (Dec. 2009), http://www.morganstanley.com/institutional/techresearch/pdfs/mobile_internet_report.pdf.

Americans are using their mobile devices to explore a rapidly growing market of mobile applications. Virtually non-existent three years ago, there are now more than 600,000 mobile applications available across multiple platforms.[13] The apps market provides "a whole new universe of opportunities for garage innovators and expansive choices for consumers" with almost every conceivable type of app available.[14] In addition to creating significant new economic opportunities for mobile entrepreneurs, applications are also adding new dimensions to our everyday lives.

- Looking to turn commute time into tutor time for your kids? There's a whole universe of apps, such as Wheels on the Bus, that use video games to engage kids and teach age-appropriate math, spelling and other lessons.[15] Education is going mobile.
- Want to make sure your teen respects your rules and the law and doesn't text while driving? The Textecution app uses a phone's GPS system to disable texting when the device is moving faster than 10 miles per hour.[16] Or with the OnStar MyLink app, you can remotely start your car and check vehicle diagnostics from virtually anywhere.[17]
- Need help remembering to take your medication? There is an app for that. There are more than 17,000 mobile health applications; many of which are used by healthcare professionals for continuing medical education, referencing medical content, remote monitoring and healthcare management.[18]

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[13] Jay Yarow and Kamelia Angelova, *Chart of the Day: Google Is Closing The Gap On Apple's App Store*, BUSINESS INSIDER, Mar. 9, 2011, http://www.businessinsider.com/chart-of-the-day-smartphone-apps-2011-3.

[14] Mobile Future, *Welcome to the Mobile Future: How Wireless Innovation is Transforming Our Ecomony and Our Lives* 11, http://www.mobilefuture.org/page/-/Mobile-Future-White-Paper.pdf; *see also* Mobile Future, *Highlights of the Mobile Year in Review 2010*, http://www.mobilefuture.org/content/pages/mobile_year_in_review_2010?/yearendvideo (last visited Apr. 9, 2011).

[15] iTunes App Store, http://itunes.apple.com/us/app/wheels-on-the-bus/id303076295?mt=8 (last visited Apr. 10, 2011).

[16] Liz Blain, *Textecution App stops Kids from Texting While They Drive*, GIZMAG (Jan. 13, 2010), http://www.gizmag.com/textecution-stops-texting-driving/13868/.

[17] Joseph L. Flatley, *OnStar Announces MyLink Smartphone Apps, Voice-Based SMS, Facebook Plans*, ENGADGET, Sept. 15, 2010, http://www.engadget.com/2010/09/15/onstar-announces-mylink-smartphone-apps-voice-based-sms-facebo/#.

[18] Mary Cronin, *Half a Billion Users of Mobile Health Apps Projected by 2015*, MEDHEALTHWORLD, Nov. 5, 2010, http://medhealthworld.code.com/?p=932.

Mobile broadband devices give Americans the power to communicate and access the Internet, anytime and anywhere. In February 2011, an average of 234 million Americans age 13 and older used a mobile device.[19] Almost 60% of American adults that have a wireless connection use a laptop or cell phone to access the Internet according to one survey, with minorities leading the race to go online wirelessly.[20] One analyst predicts that smartphones and browser-equipped enhanced phones will overtake PCs as the most common Internet access device worldwide by 2013.[21]

Last year, Americans used their mobile devices for 2.2 trillion minutes of voice service, sent 2.1 trillion text messages, placed more than 296,000 911 calls per day, posted more than 60 million tweets a day, viewed more than 200 million YouTube videos per day, and downloaded 5 billion mobile applications.[22] And these numbers continue to grow each year at an astounding rate. According to the latest Cisco report, mobile data traffic reached almost 49,000 terabytes per month in North America in 2010 and is expected to grow at an annual compound rate of 82% over the next five years.[23]

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[19] comScore Report, *supra* note 6.

[20] *See* Mobile Health at 6; Aaron Smith, *Mobile Access 2010*, PEW INTERNET & AMERICAN LIFE PROJECT 2-3 (July 7, 21010), http://www.pewinternet.org/~/media//Files/Reports/2010/PIP_Mobile_Access_2010.pdf.

[21] Press Release, Gartner, *Gartner Highlights Key Predictions for IT Organizations and Users in 2010 and Beyond* (Jan. 13, 2010), http://www.gartner.com/it/page.jsp?id=1278413.

[22] *See* Mobile Future, *Mobile Year in Review 2010 Video*, http://www.mobilefuture.org/content/pages/mobile_year_in_review_2010?/yearendvideo; CTIA—The Wireless Association, *Wireless Quick Facts*, http://www.ctia.org/media/industry_info/index.cfm/AID/10323; Jason Ankeny, *Mobile Tweets Now Over 40 Percent of Twitter Posts*, FIERCEWIRELESS, Jan. 11, 2011, http://www.fiercemobilecontent.com/story/mobile-tweets-now-over-40-percent-twitter-posts/2011-01-11; Marshall Kirkpatrick, *There Are Now 155m Tweets Posted Per Day, Triple the Number a Year Ago*, READWRITEWEB, Apr. 6, 2011, http://www.readwriteweb.com/archives/there_are_now_155m_tweets_posted_per_day_triple_th.php#; YouTube, *Music videos now on YouTube app for Android* (Jan. 12, 2011), http://youtube-global.blogspot.com/2011/01/music-videos-now-on-youtube-app-for.html?.

[23] Cisco, *Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2010–2015* (Feb. 1, 2011), http://www.cisco.com/en/US/solutions/collateral/ns341/ns525/ns537/ns705/ns827/white_paper_c11-520862.html.

Mobile broadband creates significant new economic opportunities for Americans and offers a powerful "platform for commerce," especially in rural areas.[24] In rural communities, there are typically not many large local companies hiring employees. As a result, many rural Americans are entrepreneurs, mostly self-employed or employed by very small businesses with fewer than ten employees. These entrepreneurs often work around the clock and mobile broadband access can therefore be one of the most important tools to help them stay connected while moving from the coffee shop to the office, to the home, and to the kids' baseball game.

In addition, mobile broadband connects Americans, in both urban and rural areas, to the mobile app economy that generated $2.2 billion in revenues for 2010 with sales expected to reach $38 billion by 2015.[25] Over the next four years, businesses are expected to spend up to $17 billion to create and manage mobile apps for their products and services as well as for their internal needs.[26] Mobile online shopping for retail goods and services increased from $396.3 million in 2008 to an impressive $3.4 billion in 2010, with an additional $1.5 billion in sales if travel-related purchases (airline tickets, hotels, etc.) are included.[27]

New businesses are also emerging that utilize the unique capabilities of mobile broadband, like the ability to provide location-based services. For example, founded in 2007, Foursquare, which provides a geo-location based social network that allows users to share their location with friends, grew 3,400% last year and is valued at $250 million with 8 million users

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[24] *See* Julius Genachowski, Chairman, FCC, Remarks on Broadband at a Mobile Future Event, Washington, DC: The Clock is Ticking 5 (Mar. 16, 2011), http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-305225A1.pdf.

[25] Nick Bilton, *Mobile App Revenue to Reach $38 Billion by 2015, Report Predicts*, N.Y. TIMES, Feb. 28, 2011, http://bits.blogs.nytimes.com/2011/02/28/mobile-app-revenue-to-reach-38-billion-by-2015-report-predicts/.

[26] *Id*.

[27] Press Release, ABI Research, *Mobile Commerce Sales Explode in United States: Will Top $3.4 Billion in 2010* (Dec. 17, 2010), http://www.abiresearch.com/press/3578-Mobile+Commerce+Sales+Explode+in+United+States%3A+Will+Top+$3.4+Billion+in+2010.

worldwide.[28] Gowalla, which launched a mobile platform to "check-in" and share photos, highlights and tips in 2009, has grown from 100,000 users just over a year ago to 1 million and expects to have 5-6 million users this summer.[29] LivingSocial, one of the fastest growing companies in the mid-Atlantic region, is now offering location-based bargains with local merchants to users of its mobile app.[30] Startup companies like these are also creating many new jobs for American workers.[31]

The benefits from wireless in the U.S. economy are significant. About 2.4 million American jobs are directly or indirectly dependent on the U.S. wireless industry, and the wireless sector contributes an estimated $100 billion to the U.S. GDP each year.[32] One analyst estimates the productivity gains from the deployment and use of wireless broadband will generate almost $860 billion in additional GDP by 2016.[33]

Mobile broadband generates substantial societal benefits as well by facilitating access to education, healthcare, and public safety services. This is even more true in rural America where long distances can inhibit access to institutions and specialists. For example, in the most recent

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[28] *See* Mathew Ingram, *Foursquare Is Growing Quickly — But Still Not Mainstream*, GIGAOM (Jan. 24, 2011), http://gigaom.com/2011/01/24/foursquare-is-growing-quickly-but-still-not-mainstream/; Cecilia Kang, *Foursquare Founder Selvadurai Talks About Privacy, Future*, WASH. POST, Apr. 8, 2011, http://www.washingtonpost.com/blogs/post-tech/post/foursquare_founder_selvadurai_talks_about_privacy_future/2011/04/08/AFGYa21C_blog.html?wprss=post-tech. .

[29] *See* Shayndi Raice, *App Watch: Gowalla Promoting Virtual Passports*, WALL ST. J., Mar. 14, 2011, http://blogs.wsj.com/digits/2011/03/14/app-watch-gowalla-promoting-virtual-passports/; Jon Swartz, *Are Foursquare, Gowalla, Loopt going places?*, USA TODAY, Mar. 14, 2011, http://www.usatoday.com/tech/news/2011-03-11-checkin-services-sxsw_N.htm.

[30] Daiti Hanluain, *LivingSocial Delivers Location-Specific Deals*, APPEDIA, Mar. 8, 2011, http://www.appedia.com/news/2010.html.

[31] For example, LivingSocial, which began in 2008, now has 1,200 employees and is hiring about 6 new employees every day. *See* NVTC, *Titans Breakfast featuring Tim O'Shaughnessy* (Apr. 6, 2011), http://nvtc2.ve.carpathiahost.net/events/getarchive.php?event=TITANS-35.

[32] *See* Reply Comments of CTIA-The Wireless Association, GN Docket Nos. 09-157, 09-51 at 4 (Nov. 5, 2009).

[33] Roger Entner, *The Increasingly Important Impact of Wireless Broadband Technology and Services on the U.S. Economy* 4 (2008), http://files.ctia.org/pdf/Final_OvumEconomicImpact_Report_5_21_08.pdf.

Rural Broadband Report, the Commission found that "the full range of health care services is not available in rural areas, because vast distances and low population densities make access to care, particularly specialty care, uneconomic" but that "[w]ith sufficiently robust broadband services, clinics in rural areas can have access to facilities and specialists in more-densely populated areas."[34] Mobile broadband can help bridge the gap and should be encouraged, through on-going, targeted CAF support, to continue and expand on such efforts.

We are indeed, as the President says, "beginning the next transformation in information technology: the wireless broadband revolution."[35] To fully realize the benefits, however, all Americans, not just those living in urban areas, must have access to mobile broadband.

II. ON-GOING SUPPORT IS NEEDED FOR UBIQUITOUS MOBILE BROADBAND COVERAGE.

Mobile broadband "can be the great enabler that restores America's economic well-being and opens doors of opportunity for all Americans to pass through, no matter who they are, where they live, or the particular circumstances of their individual lives."[36] However, if Americans in rural communities only have access to fixed broadband, they will miss out on the substantial benefits created by the wireless ecosystem. The Commission must therefore make ubiquitous mobile broadband coverage "its own independent priority" with on-going support from the CAF.[37]

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[34] FCC, *Bringing Broadband to Rural America: Report on Rural Broadband Strategy* 10 ¶ 20 (rel. May 22, 2009), http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-291012A1.pdf.

[35] The White House, Presidential Memorandum: Unleashing the Wireless Broadband Revolution (June 28, 2010), http://www.whitehouse.gov/the-press-office/presidential-memorandum-unleashing-wireless-broadband-revolution.

[36] Michael J. Copps, Acting Chairman, FCC, Statement regarding *A National Broadband Plan for Our Future,* GN Docket No. 09-51 (Apr. 8, 2009).

[37] *Notice* ¶ 81. As the Commission acknowledged in the Notice, "[g]iven the important benefits of and the strong consumer demand for mobile services, ubiquitous mobile coverage must be a national priority." *Id.* ¶ 241.

The President's National Wireless Initiative for winning the future calls for the availability of 4G wireless services to at least 98 percent of Americans within the next five years.[38] According to NTIA's findings, approximately 36 percent of U.S. consumers have access to wireless Internet service at maximum advertised download speeds of 6 Mbps or greater, which some consider 4G wireless broadband service; 95 percent of U.S. consumers have access to wireless Internet service speeds of at least 768 kbps, or 3G wireless service.[39]

Substantial and on-going investment is needed to meet the President's goal and achieve ubiquitous mobile broadband coverage. The competitive wireless industry will continue to invest in 3G and 4G networks, but absent additional government investment, millions of Americans living in high cost rural areas – where the economics of providing mobile broadband are insurmountable – will not have access to the benefits of mobile broadband.

The Commission has previously proposed the creation of a Mobility Fund to provide limited support, between $100 and $300 million, to subsidize the initial deployment of 3G, or better, mobile networks in high-cost unserved areas.[40] However, not only is the level of proposed funding well short of the estimated billions needed to deploy 4G infrastructure, but it does not address the on-going expenses of operating a network in a high-cost area.[41] A small amount of one-time support is insufficient if the business model is not economically sustainable. Government funding is needed to support operating costs, and the President's initiative

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[38] *See* NWI Details, *supra* note 3.

[39] Press Release, NTIA, Commerce's NTIA Unveils National Broadband Map and New Broadband Adoption Survey Results (Feb. 17, 2011), http://www.ntia.doc.gov/press/2011/NationalBroadbandMap_02172011.html.

[40] *See* Universal Service Reform, Mobility Fund, *Notice of Proposed Rulemaking*, 25 FCC Rcd 14716, 14722 ¶ 13 (2010); *see also* Comments of Mobile Future, WT Docket No. 10-208 (filed Dec. 16, 2010).

[41] One expert has estimated in 2008 that the ubiquitous deployment of just 3G mobile broadband-capable infrastructure would cost about $22 billion. *See* COSTQUEST ASSOCIATES, INC., *U.S. Ubiquitous Mobility Study* 4 (Apr. 17, 2008) (attached to Comments of CTIA-The Wireless Assoc., WC Docket No. 05-337, CC Docket No. 96-45 (filed Apr. 17, 2008)).

recognizes this by not only calling for a one-time investment of $5 billion for 4G buildout but also USF reform "to ensure millions more Americans will be able to use this technology."[42]

III. THE COMMISSION SHOULD PROMOTE, NOT LIMIT, COMPETITION AMONG PROVIDERS FOR SUPPORT FUNDING.

The Commission should not adopt proposals that limit competition among providers for support funding. For example, eligibility for funds should not be limited only to those operators that have already been designated as an Eligible Telecommunications Carriers ("ETCs") in the relevant geographic unserved area.[43] If an area remains unserved even after an existing ETC has been receiving support to provide wireless services in that area, then the public interest favors broadening the pool of applicants to allow new entrants an opportunity to more quickly and more efficiently deploy advanced wireless service. The added competition will also drive bids to reflect actual costs. The Commission should therefore allow all entities to participate in the funding process that have been designated, or have applied for ETC designation, in the relevant area. Competition for those rights will spur funding efficiency.

CONCLUSION

To achieve the President's goal within the next five years, the Commission should expeditiously conclude this proceeding, provide on-going support for ubiquitous mobile broadband coverage, and distribute funds for the provision of mobile broadband services in high-cost unserved areas as soon as practicable. Those in highly rural and remote areas should not be allowed to fall further behind. Wireless technologies will change our lives in ways unimaginable today, and it is important that all Americans have the opportunity to take part in the wireless broadband revolution.

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[42] NWI Details, *supra* note 3.

[43] *See Notice* ¶ 319.

Respectfully submitted,

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